

## UNITED STATES DISTRICT COURT

for the

District of South Carolina



United States of America )

v. )

Jean H. Toal; Costa M. Pleicones; donald W. Beatty;  
Jonh H. Kittredge; and Kaye G. Hearn )

Case No.

3:23\_cv\_06187\_DCC-MGB

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Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of April 7, 2010 in the county of Richland, South Carolina in the  
Columbia Division District of South Carolina, the defendant(s) violated:

## Code Section

18U.S.C. section 241

18U.S.C. section 242

## Offense Description

Conspiracy Against Civil Rights of Citizens

Deprivation of Rights Under the Color of Law

This criminal complaint is based on these facts:

On April 7, 2010, while the South Carolina Supreme Court building located in Columbia, SC, defendant Jean Toal, in her official capacity as chief justice, did conspire by and between Costa Pleicones, Donadl Beatty, Jonh Kittredge, and Kaye Hearn to injure, threaten, and intimidate Patrick Lee Booker in the free exercise or enjoyment of a right or privilege secured by the Constitution or laws of the United States or because of his exercise of such a right. This act of conspiracy against rights occurred wholly outside of any legal or judicial proceeding. Later thereafter, however, the

☒ Continued on the attached sheet.

Complainant's signature

Patrick Lee Booker, Advocate of justice

Printed name and title

Sworn to before me and signed in my presence.

Date: \_\_\_\_\_

Judge's signature

City and state: \_\_\_\_\_

Donald C. Coggins, U.S. District Judge

Printed name and title

## PRIVATE CRIMINAL COMPLAINTS



### Private Criminal Complaint Information Form

Pennsylvania law allows for private citizens to file Private Criminal Complaints through its Court system with certain restrictions which are detailed in Title 42 Pennsylvania Rules of Criminal Procedure (Pa.R.Crim.P) Rule 420 (Summary Violations), Rules 504 (Contents of Complaint) and Rule 506 (Approval for Private Complaints). The York County District

Attorney's Office Detective Bureau reviews all requests for Private Criminal Complaints.

With reference to Summary Violations, a citizen goes directly to the Issuing Authority within the jurisdiction where the incident took place and files a complaint. (This is the local Magisterial District Justice.) The District Attorney's Office does not review a Summary Complaint. A summary offense would include "Disorderly Conduct", "Harassment", and other minor crimes. Citizens are directed to the following web site for guidance in identifying the proper Magisterial District Justice for their Private Criminal Complaint: <https://yorkcountypa.gov/courts-criminal-justice/district-courts.html>

York County Magisterial District Justice jurisdictional map:

<https://yorkcountypa.gov/images/pdf/MDJMap.pdf>

If you wish to bring felony and/or misdemeanor criminal charges against another individual you must complete the Private Criminal Complaint and District Attorney's Office information form which is required to bring charges in York County. Those forms can be downloaded here: [Private Criminal Complaint](#)

\*\*\*\*\*Private Criminal Complaints will NOT be accepted via Email\*\*\*\*\*

Rule 504 addresses the required contents for the Private Criminal Complaint. This information can be found at the following link:

<http://www.pacode.com/secure/data/234/chapter5/s504.html>

A Private Criminal Complaint should never be used to address a monetary or other dispute which is properly the subject of a civil action. You must understand that filing criminal charges against another individual is a serious matter which requires that a crime has been committed and that the person(s) accused has committed this crime. There are other legal requirements that will also be addressed by the District Attorney's Office such as the statute of limitations, proper jurisdiction, etc.

Before you file a Private Criminal Complaint, you must understand there are numerous laws in the Pennsylvania Crimes Code that address False swearing (18 Pa. CS 4903), Unsworn Falsification (18 Pa. CS 4904) and False Reports to Law Enforcement (18 Pa. CS 4906). Refer to this link for details on these crimes:

<http://www.legis.state.pa.us/WU01/LI/LI/CT/HTM/18/18.HTM>

In order to avoid being in violation of these and possibly other sections of the Crimes Code, you must be complete, detailed, honest and accurate when describing the facts in the affidavit and in all conversations with detectives. Anyone violating these laws is subject to criminal prosecution.

Prior to writing your criminal complaint we recommend you review the Pennsylvania Crimes Code to determine which section(s) you believe address the actions you are accusing the defendant of committing. The following link will take you to Title 18, Crimes and Offenses:

<http://www.legis.state.pa.us/WU01/LI/LI/CT/HTM/18/18.HTM>

County Detectives will be available to direct you with identifying which crimes code section(s) may apply.

Rule 506 addresses the approval process for all Private Criminal Complaints. The following link with detail this process.

## PROGRAMS

ARD

Private Criminal Complaints

Precious Metals

Victim/Witness

Jail Release Notice

Internships

ESCAPE  
WEBSITE

## CONTACT US

Full Name

Email

Enter Message Here...

Submit

Submit

ESCAPE  
WEBSITE

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Rule 506 addresses the approval process for all Private Criminal Complaints. The following link with detail this process.

<http://www.pacode.com/secure/data/234/chapter5/s506.html>

The York County District Attorney will either approve or disapprove your complaint. Individuals whose complaints have been disapproved have the right to petition the court of common pleas for a review of the decision. You must first seek assistance from police for misdemeanor or felony charges. If you haven't contacted the police department with jurisdiction for the matter (either state or local police) your referral will be denied and referred to police for investigation.

Once you have reviewed these forms and documents you will be in a better position to understand and successfully complete the process. Should you have any questions or concerns please contact the District Attorney's Office Detective Bureau at 717-771-9600.

Once the forms are completed you can either drop them in the mail or come into the District Attorney's Office. All correspondence should be addressed to:

York County District Attorney's Office  
45 North George St.  
York, PA 17401

Attention: Private Criminal Complaint

Individuals interested in meeting with a County Detective shall arrange for an appointment via the District Attorney's Office receptionist @ 717-771-9600.

**Private Criminal Complaints should not be filed in regard to bad checks. Please use the link below for our Bad Check Program:**

<http://www.checkprogram.com/staticwebsites/yorkcountypa/>



COMMONWEALTH OF PENNSYLVANIA

COUNTY OF

Magisterial District Number:

MDJ Name: Hon.

Address:

Telephone:

**PRIVATE  
CRIMINAL COMPLAINT**COMMONWEALTH OF PENNSYLVANIA  
VS.

DEFENDANT: NAME and ADDRESS

Docket No:

Date Filed:

OTN:

(Above to be completed by court personnel)

(Fill in defendant's name and address)

Notice: Under Pa.R.Crim.P. 506, your complaint may require approval by the attorney for the Commonwealth before it can be accepted by the magisterial district court. If the attorney for the Commonwealth disapproves your complaint, you may petition the court of common pleas for review of the decision of the attorney for the Commonwealth.

Fill in as much information as you have.

Defendant's Race/Ethnicity	Defendant's Sex	Defendant's D.O.B.	Defendant's A.K.A. (also known as)
<input type="checkbox"/> White <input type="checkbox"/> Black <input type="checkbox"/> Asian <input type="checkbox"/> Native American <input type="checkbox"/> Hispanic <input type="checkbox"/> Unknown	<input type="checkbox"/> Female <input type="checkbox"/> Male		
<b>Defendant's Vehicle Information</b> Plate Number   State   Registration Sticker (MM/YY)			

I,

(Name of Complainant-Please Print or Type)

do hereby state: (check appropriate box)

1. ☐ I accuse the above named defendant who lives at the address set forth above  
☐ I accuse the defendant whose name is unknown to me but who is described as \_\_\_\_\_  
☐ I accuse the defendant whose name and popular designation or nickname is unknown to me and whom I have therefore designated as John Doe.

with violating the penal laws of the Commonwealth of Pennsylvania at \_\_\_\_\_  
(Place Political Subdivision)

in \_\_\_\_\_ County on or about \_\_\_\_\_

Participants were: (if there were participants, place their names here, repeating the name of the above defendant)

AOPC 411A

Page 1 of 2

FREE INTERPRETER  
www.j2courts.us/language-rights

Defendant's Name:

Docket Number:

**PRIVATE  
CRIMINAL COMPLAINT**

2. The acts committed by the accused were:  
 (Set forth a summary of the facts sufficient to advise the defendant of the nature of the offense charged. A citation to the statute allegedly violated, without more, is not sufficient. In a summary case, you must cite the specific section and subsection of the statute or ordinance allegedly violated.)